



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

SEP 15 2000

Ms. Esmeralda Garcia
AGWORKS, Inc.
PO Box 250
Preston, IA 52069-0250

Ref. No. 00-0195

Dear Ms. Garcia:

This is in response to your letter of July 7, 2000, requesting clarification on placarding requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if the weight of bulk containers loaded on the same transport vehicle with non-bulk containers need to be included when determining the total weight of Table 2 materials on the vehicle under § 172.504(c).

The answer is no. As provided by § 172.504(c) except for bulk packages, a transport vehicle carrying less than 454 kg (1,001 pounds) aggregate gross weight (packaging plus contents) of Table 2 hazardous materials need not be placarded. When calculating the 454 kg (1,001 pounds) aggregate gross weight, only the weight of Table 2 hazardous materials in non-bulk packaging needs to be included.

I hope this satisfies your request.

Sincerely,

John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards



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AGWORKS

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00-0195

July 7, 2000

U.S. Department of Transportation
Research and Special Programs Administration
Office of Hazardous Materials Standards
400 Seventh Street, S.W.
Washington D.C. 20590

As a software developer in the agricultural field specializing in programming DOT shipping and placarding requirements for our customers, we have a question regarding regulation 49CFR 172.504(c)(1).

This regulation states that placarding is excepted on "A transport vehicle or freight container which contains less than 454 kg (1001pounds) aggregate gross weight of hazardous materials covered by Table 2..."

Our question is the following: Does this rule take into consideration the weight of any bulk containers that may be in the transport vehicle when determining the total weight on the vehicle? In our interpretation of the regulation, we are taking into account the weight of the bulk container. Is this correct?

Sincerely,

Esmeralda Garcia
Database Manager
AGWORKS, Inc.